

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

UNITED STATES OF AMERICA

v.

MICHAEL TABA (07)

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CAUSE NO. 3:17-CR-155-L

DR. MICHAEL TABA'S WITNESS LIST

Pursuant to Rule 16.1(2) of the Local Rules for the Northern District of Texas and the Scheduling Order entered by the Court, Dr. Michael Taba, defendant, submits the following list of witnesses that may be used in his defense at trial, exclusive of impeachment and rebuttal witnesses. Dr. Taba adopts all government and co-defendant witness lists, including designated expert witnesses, filed in this case, subject to and without waiving challenges to admissibility. Dr. Taba reserves the right to amend or supplement this witness list, subject to the Court's rulings.

Last Name	First Name	Category	Narrative Summary of Testimony
Patient RC		Possible	Surgical and post-op care received by Dr. Taba
Patient LB		Possible	Surgical and post-op care received by Dr. Taba
Patient JA		Possible	Surgical and post-op care received by Dr. Taba
Patient CM		Possible	Surgical and post-op care received by Dr. Taba
Patient EH		Possible	Surgical and post-op care received by Dr. Taba
Patient MD		Possible	Surgical and post-op care received by Dr. Taba

Last Name	First Name	Category	Narrative Summary of Testimony
Patient JK		Possible	Surgical and post-op care received by Dr. Taba
Patient DJ		Possible	Surgical and post-op care received by Dr. Taba
Patient EM		Possible	Surgical and post-op care received by Dr. Taba
Patient JJ		Possible	Surgical and post-op care received by Dr. Taba
Patient LH		Possible	Surgical and post-op care received by Dr. Taba
Patient AR		Possible	Surgical and post-op care received by Dr. Taba
Patient YB		Possible	Surgical and post-op care received by Dr. Taba
Patient RS		Possible	Surgical and post-op care received by Dr. Taba
Patient LF		Possible	Surgical and post-op care received by Dr. Taba
Patient AD		Possible	Surgical and post-op care received by Dr. Taba
Patient JJ		Possible	Surgical and post-op care received by Dr. Taba
Patient JS		Possible	Surgical and post-op care received by Dr. Taba
Patient IP		Possible	Surgical and post-op care received by Dr. Taba
Patient LM		Possible	Surgical and post-op care received by Dr. Taba
Patient KC		Possible	Surgical and post-op care received by Dr. Taba
Patient LP		Possible	Surgical and post-op care received by Dr. Taba
Patient SB		Possible	Surgical and post-op care received by Dr. Taba
Patient EL		Possible	Surgical and post-op care received by Dr. Taba
Patient SR		Possible	Surgical and post-op care received by Dr. Taba

Last Name	First Name	Category	Narrative Summary of Testimony
Patient KR		Possible	Surgical and post-op care received by Dr. Taba
Patient AM		Possible	Surgical and post-op care received by Dr. Taba
Patient NB		Possible	Surgical and post-op care received by Dr. Taba
Patient SR		Possible	Surgical and post-op care received by Dr. Taba
Patient LO		Possible	Surgical and post-op care received by Dr. Taba
Patient IS		Possible	Surgical and post-op care received by Dr. Taba
Patient BE		Possible	Surgical and post-op care received by Dr. Taba
Patient RM		Possible	Surgical and post-op care received by Dr. Taba
Patient MM		Possible	Surgical and post-op care received by Dr. Taba
Patient EG		Possible	Surgical and post-op care received by Dr. Taba
Patient RF		Possible	Surgical and post-op care received by Dr. Taba
Patient JA		Possible	Surgical and post-op care received by Dr. Taba
Patient PS		Possible	Surgical and post-op care received by Dr. Taba
Patient BO		Possible	Surgical and post-op care received by Dr. Taba
Patient CO		Possible	Surgical and post-op care received by Dr. Taba
Patient LP		Possible	Surgical and post-op care received by Dr. Taba
Patient AC		Possible	Surgical and post-op care received by Dr. Taba
Patient LC		Possible	Surgical and post-op care received by Dr. Taba
Patient CC		Possible	Surgical and post-op care received by Dr. Taba
Patient AC		Possible	Surgical and post-op care received by Dr. Taba

Last Name	First Name	Category	Narrative Summary of Testimony
Patient AD		Possible	Surgical and post-op care received by Dr. Taba
Patient TD		Possible	Surgical and post-op care received by Dr. Taba
Patient MD		Possible	Surgical and post-op care received by Dr. Taba
Patient SF		Possible	Surgical and post-op care received by Dr. Taba
Patient LF.2		Possible	Surgical and post-op care received by Dr. Taba
Patient LF		Possible	Surgical and post-op care received by Dr. Taba
Patient CB		Possible	Surgical and post-op care received by Dr. Taba
Patient CB.2		Possible	Surgical and post-op care received by Dr. Taba
Patient JB		Possible	Surgical and post-op care received by Dr. Taba
Patient SB		Possible	Surgical and post-op care received by Dr. Taba
Patient TC		Possible	Surgical and post-op care received by Dr. Taba
Patient RC		Possible	Surgical and post-op care received by Dr. Taba
Patient KC		Possible	Surgical and post-op care received by Dr. Taba
Patient CB		Possible	Surgical and post-op care received by Dr. Taba
Patient PA		Possible	Surgical and post-op care received by Dr. Taba
Patient LA		Possible	Surgical and post-op care received by Dr. Taba
Patient AC		Possible	Surgical and post-op care received by Dr. Taba
Patient AC.2		Possible	Surgical and post-op care received by Dr. Taba
Patient DC		Possible	Surgical and post-op care received by Dr. Taba
Patient TC		Possible	Surgical and post-op care received by Dr. Taba

Last Name	First Name	Category	Narrative Summary of Testimony
Patient DJ		Possible	Surgical and post-op care received by Dr. Taba
Patient DS		Possible	Surgical and post-op care received by Dr. Taba
Reserved			
Reserved			
Reserved			
Reserved			
Reserved			
Castellano	John	Possible	Dr. Taba's Former Medical Assistant re: office procedures and handling of non-narcotic prescriptions
Narvaiz	Diana	Possible	Former front office receptionist re: handling of non-narcotic prescriptions
Zamanian	Hossein	Probable	Dr. Taba's Accountant re: transactions involving loans and repayment
Packard	Pegah	Probable	Surgical Scheduler in Dr. Taba's office
Jossa	Robbie	Possible	Outreach marketing procedures by Ability Pharmacy et al.
McJunkins	Thomas	Possible	Outreach marketing procedures by Ability Pharmacy et al.
Summerville	Nicole	Possible	Attorney re: Grand Jury SDT documents compilation
McGovern	Casey	Possible	Attorney re: Grand Jury SDT documents compilation
Schmidt	Michael	Possible	Banker re: Dr. Taba obtaining a loan
Massey	Joseph	Possible	Banker re: Dr. Taba obtaining a loan
Mesches	Ben	Possible	Atty to testify about civil judgment obligation
Van Gieson	Robert "Hump"	Probable	Construction on Dr. Taba's office and residence

Last Name	First Name	Category	Narrative Summary of Testimony
King	Raymund	Possible	Atty to testify about civil judgment obligation
Shirani	Shiva	Possible	Hard cash loan receiver
Amador	Blanca	Possible	Claims Adjuster for DOL to testify re: Dr. Taba's patients
McCall	Steven	Possible	Compounding Pharmacist familiar with compounding topical creams
Aguilar	Nicholas	Possible	PA prescribing compound creams for Ability Pharmacy
Benson	Michael	Possible	Son of Dr. Leslie Benson re: practices involving father
Niknam	Jabber	Possible	Pharmacy Rep for Apothecary
Noryian	Leyla	Probable	Promissory Note and loan documentation
Mofid	Ashraf	Possible	Promissory note and loan documentation
Cruz	Erwin	Possible	Testify re: Civil Lawsuit
Aleem	Mohammed	Possible	Physician at Medical City Plano re: interview of Dr. Taba
Pratt	Sharneece	Possible	Former Employee of Dr. Taba
McDonald	David	Possible	Sub-contractor for "Hump" re: construction
Bauchman	Judy	Possible	Former employee of Ability Pharmacy
Lopez	Carlos	Possible	Employee of Ability Pharmacy
Record Custodian, Capital One		Possible	To authenticate business records relating to loan
Record Custodian, Chase Bank		Possible	To authenticate business records relating to loan
Record Custodian, Prosperity Bank		Possible	To authenticate business records relating to loan

Last Name	First Name	Category	Narrative Summary of Testimony
Record Custodian, Department of Labor		Possible	To verify and authenticate claims data and business records
Record Custodian, OWCP		Possible	To verify and authenticate claims data and business records
Record Custodian, Queen Shiva		Possible	To verify and authenticate claims data and business records
Record Custodian, Ability Pharmacy		Possible	To verify and authenticate claims data and business records
Record Custodian, Park Row		Possible	To verify and authenticate claims data and business records
Record Custodian, Bandoola Pharmaceutical		Possible	To verify and authenticate claims data and business records
Record Custodian, Industrial & Family Pharmacy		Possible	To verify and authenticate claims data and business records
Record custodian, Athena EMR		Possible	Verification and authentication of Dr. Taba's practice management system
Lewis	David	Expert	Dr. Lewis is an anesthesiologist and pain medicine specialist who will opine on the propriety of prescribing non-opiate creams in conjunction with opiates in post-surgical patients as well as on procedures relating to refills
Buffington	Daniel	Expert	Pharmacology expert
Small	Neal	Expert	Orthopedic Surgeon and expert
Baggett	Bart	Expert	Mr. Baggett is a handwriting expert who will opine on the authenticity of signatures on the prescriptions which are attributed to Dr. Taba

Last Name	First Name	Category	Narrative Summary of Testimony
Baumann	Jarol	Possible	Physical Therapist interviewed by govt
Guadian	Amoret "Mona"	Probable	Ability Pharmacy Employee
Moreno	Ray	Possible	Former pharmacist at Ability Pharmacy
Marines	Megan	Possible	Ability Pharmacy Employee
Rajehsekharan	Sandra	Possible	Employee of Advanced Orthopedics
Castro	Ashley	Possible	Former employee of Advanced Orthopedics
Bryant	Coetta	Possible	Former employee of Advanced Orthopedics
Dalton	Ana	Possible	Former employee of Advanced Orthopedics
Day	Sofia	Possible	Former employee of Advanced Orthopedics
Garcia	Cecilia	Possible	Former employee of Advanced Orthopedics
Dominguez	Sabrian	Possible	Former employee of Advanced Orthopedics
Gonzalez	Maria	Possible	Former employee of Advanced Orthopedics
Guerrero	Olga	Possible	Former employee of Advanced Orthopedics
Moore	Amber	Possible	Former employee of Advanced Orthopedics
Santiago	Erica	Possible	Former employee of Advanced Orthopedics
Webb	Sharon	Possible	Former employee of Advanced Orthopedics
Torres	Jacqueline	Possible	Former employee of Advanced Orthopedics
Behen	Zoe	Possible	Former employee of Advanced Orthopedics
Babyeyko-Dryden	Sasha	Possible	Former employee of Advanced Orthopedics
Necessary	Kimberly	Possible	Ability Pharmacy Employee

Last Name	First Name	Category	Narrative Summary of Testimony
Ritter	Robert	Possible	Former pharmacist
Ritter	Julie	Possible	Former employee of pharmacies
Villareal	Angela	Possible	Former employee of pharmacies
Monjaraz	Jesse	Possible	Former employee of pharmacies
Pennington	Courtney	Possible	Former employee of pharmacies
Trejo	Joshua	Possible	Former employee of pharmacies
Rydberg	Celine	Possible	Chris Rydberg's family member
Osorio-Castillo	Carmen	Possible	Physician
Ali	Saba	Possible	Assistant to Hossein Zamanian
Chandrasahnan	Gopinath	Possible	Physician
Abghari	Mahtab	Possible	Proffer with govt
Lopez	Carlos	Possible	Former employee of pharmacies
Lopez	Roxanne	Possible	Dr. Williams' assistant
Craighead	Christine	Possible	Former employee of Hope pharmacy
Alavi	Ali	Possible	Physician dealing with Ability pharmacy
Guerra	Victoria	Possible	Employee of pharmacy that dealt with Kevin Williams
Driver	Melissa	Possible	Former employee of Dr. Taba

Respectfully,

/s/ Erin Brennan

Erin Brennan

Texas Bar No. 24129239

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/s/ Steve Wells

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CERTIFICATE OF SERVICE

I, Erin Brennan, hereby certify that on August 14, 2023, I electronically filed the foregoing document using the ECF system of the United States District Court, Northern District of Texas. Pursuant to L. CRIM. R. 49.2(f), delivery of the automatically generated ECF notice constitutes service under FED. R. CRIM. P. 49(b) on the attorney(s) of record.

/s/ Erin Brennan

ERIN BRENNAN